

From: nancy.munn
To: Sean.Sheldrake/R10/USEPA/US@EPA
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Subject: Re: Fw: Weir discharge evaluation - T4 CDF
Date: 04/23/2009 08:09 AM

I have no problem. However, note that the biological opinion will state that the action will not be covered for an overflow at the cdf weir, if a cdf is permitted at all.

Nancy Munn, PhD
NMFS

Sheldrake.Sean@epamail.epa.gov wrote:

>
> All,
>
> Please see the attached. I don't see a problem agreeing to strike the
> analysis with a commitment of project shutdown should overflow be
> imminent.
>
> Let me know if you have any concerns.
>
> Thank you.
>
> S
>
> Sean Sheldrake
> USEPA, Region 10
> Environmental Cleanup Office
> 1200 Sixth Avenue, Suite 900, ECL-110
> Seattle WA 98101-3140
> sheldrake.sean@epa.gov
> Phone: 206/553-1220 / Fax: 206/553-0124
> Region 10 Dive Team: <http://yosemite.epa.gov/r10/oea.nsf/webpage/dive+team>
> Portland Harbor Cleanup:
> <http://yosemite.epa.gov/r10/cleanup.nsf/sites/ptldharbor>
> Deliveries: Parking Garage mailroom (1st floor)
> Visitors: Check-in @ PERC / Service Center on 12th floor:
> <http://yosemite.epa.gov/r10/extaff.nsf/PERC/Visiting+Seattle>
> ----- Forwarded by Sean Sheldrake/R10/USEPA/US on 04/22/2009 03:17 PM
> -----
> *LaFranchise, Nicole" <Nicole.LaFranchise@portofportland.com>*
>
> 04/22/2009 03:12 PM
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> To Sean Sheldrake/R10/USEPA/US@EPA, "Ken Fellows" <Kfellows@parametrix.com>
> cc "Tom Schadt" <tschadt@anchoragea.com>, "Elizabeth Appy" <eapp@anchoragea.com>, "John Verduin" <jverduin@anchoragea.com>, "Todd Thornburg" <tthornburg@anchoragea.com>, "Ben Hung" <bhung@anchoragea.com>, "McKenna, Jim" <Jim.McKenna@portofportland.com>
> Subject Weir discharge evaluation - T4 CDF
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> Sean,
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> Over the past several weeks, Anchor QEA has been providing me with
> estimates for the resumption of the Phase II work - among those tasks
> is the technical work related to evaluating the weir discharge from
> the CDF. This work includes the work plan, reasonable potential
> analysis (RPA), mixing zone study and associated project support for
> these efforts. The subcontractor estimate for this work came in at
> over \$100,000. Considering that under very conservative assumptions,
> discharge through the weir would, at best, be no more than 2 days
> during CDF filling with T4 sediment, we wanted to carefully rethink
> this expenditure and whether it was truly beneficial to the project.
> We have considered from a cost-benefit perspective the options of
> performing the weir discharge analysis compared to committing to a no
> weir discharge requirement during filling with T4 sediment. We have
> concluded that the cost of conducting the weir discharge evaluation
> work far outweighs any benefit when we can instead provide a
> commitment to EPA that no discharge from the weir will occur during

> filling with T4 sediment. This is because it would be more
> cost-effective to manage the water through construction best
> management practices (BMPs), as necessary.
>
> The weir overflow analysis is based on an improbable combination of
> conservative assumptions, including high dredge inflow rates,
> inefficient dredge production rates (i.e. higher than expected water
> content in the dredge slurry), long work days (i.e. 20 hours), low
> hydraulic conductivity in the berm material, and no management
> intervention of construction activities. Under this unlikely
> combination of conditions, the water balance model indicated the pond
> might overtop the weir on Day 9 of an 11-day dredging project, and
> discharge to the river for about one and a half days. Using more
> reasonable and likely assumptions, overflow would not be predicted to
> occur at all. Further, the remaining dredge volume in Slip 3, and
> thus the duration of hydraulic dredging, should be reduced with the
> removal of the Phase I portion of the dredge prism. All things
> considered, it is reasonable to expect the hydraulic dredge slurry can
> be fully contained behind the weir, with no discharge, by
> appropriately managing dredge filling rates and construction work
> schedules if necessary.
>
> Therefore, the Port would like to propose striking this effort from
> the project and instead updating the model analysis with new Phase II
> dredge inflow rates to determine conditions for no discharge (as
> described above). No discharge evaluation will be necessary as the
> Port will manage the dredging during Phase II to result in no weir
> discharge to the river, including, if necessary, temporarily stopping
> the dredge operation to allow for the water surface in the CDF to
> equilibrate with the river.
>
> We will likely construct the berm with a weir or some type of
> controlled overflow structure that allows water to be released for
> emergency safety purposes. With such a structure in place, should a
> future CDF filling event anticipate the need for weir discharge, then
> that user (in concert with the Port) could complete a weir discharge
> evaluation and seek approval from EPA at that time. As we've
> mentioned, we do not anticipate that being the case based on our
> vision of future filling events, which is that material will be
> brought to the CDF via barge, offloaded using a slurry pump using
> ponded CDF water such that a closed loop system is implemented.
>
> Please let me know if this proposal is acceptable to EPA.
>
> Thanks,
>
> *Nicole LaFranchise*
> Environmental Project Manager
>
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